

NOV 20 2020

David J. Bradley, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Michael Palma	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:20-CV-02741
	§	
HARRIS COUNTY APPRAISAL	§	
DISTRICT and DEDRA DAVIS	§	
Defendants.	§	

PALMA'S DISCOVERY REQUEST

To both defendants:

Because there are only three questions being posited please allow me to utilize this simple document to request them. The first line will be where the line can be found with the question after it. Thank you for understanding and your responses.

In accordance with rule 26 of the Federal Rules of Civil procedure you have 14 days from date of the 26(f) hearing to produce the items requested. I will however allow 14 days from the first business day of receipt of these questions.

The Texas Constitution states in Section 1b Article 8 that "All real property and tangible personal property in this State, unless exempt as required or permitted by this Constitution, whether owned by natural persons or corporations, other than municipal, shall be taxed in proportion to its value, which shall be ascertained as may be provided by law."

Q1: Produce a list of what properties are "exempt as required."

Section 11.01(b) of the Texas Tax code states: "This state has jurisdiction to tax real property if located in this state."

Q2: Provide the legal definition of "located in this state."

Q3: If the answer to Q2 is different then what two appellate court decisions have stated this to mean then provide your legal basis for the difference.

Respectfully Submitted

/s/ Michael F. Palma
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CERTIFICATE OF E-MAILING

I certify that on November 15, 2020 the foregoing documents were e-mailed to all parties listed in the Certificate of Service

CERTIFICATE OF SERVICE

I certify that on November 15, 2020 the foregoing document was submitted via email to all known defendant's counsel as of this date: Tanya Robinson and Ramon G. Viada.

Cc to Jennifer Holloway and Merry Smith

Respectfully Submitted

/s/ Michael F. Palma
Michael F. Palma